

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:)
)
MCI COMMUNICATIONS SERVICES, INC.;)
BELLATLANTIC COMMUNICATIONS, INC.;)
NYNEX LONG DISTANCE COMPANY; TTI)
NATIONAL, INC.; TELECONNECT LONG)
DISTANCE SERVICES AND & SYSTEMS)
COMPANY; AND VERIZON SELECT)
SERVICES, INC.)

MAR 05 2010

PUBLIC SERVICE
COMMISSION

COMPLAINANTS)

Case No. 2007-00503

v.)
)
WINDSTREAM KENTUCKY WEST, INC.;)
WINDSTREAM KENTUCKY EAST, INC. –)
LEXINGTON; AND WINDSTREAM)
KENTUCKY EAST, INC. – LONDON)

DEFENDANTS)

**SPRINT NEXTEL’S PETITION FOR
CONFIDENTIAL TREATMENT**

Sprint Communications Company L.P., Sprint Spectrum L.P., Nextel West Corp., and NPCR, Inc. d/b/a Nextel Partners (collectively, “Sprint Nextel”), by counsel, and pursuant to 807 KAR 5:001, Section 7, petition the Kentucky Public Service Commission (“PSC”) for an Order granting confidential treatment to portions of their March 5, 2010 Response to the February 12, 2010 Data Requests filed by Windstream Kentucky East, LLC and Windstream Kentucky West, LLC (collectively, “Windstream Kentucky”). In support of this petition, Sprint Nextel states as follows:

1. Sprint Nextel is requesting confidential treatment for the portions of its Response that relate to Windstream Kentucky Data Request Nos. 10 and 11. The information provided in

response to Data Request No. 10 is originating access minutes by year from 2006 to the present for each Kentucky local exchange carrier. The information provided in response to Data Request No. 11 is terminating access minutes by year from 2006 to the present for each Kentucky local exchange carrier.

2. These portions of Sprint Nextel's Response contain proprietary information that would aid competitors of Sprint Nextel and such proprietary trade secret information is subject to protection from disclosure pursuant to Kentucky law. See KRS 61.870, et seq.

3. The portions of Sprint Nextel's Response for which confidential treatment is sought are specific data on minutes of traffic carried on Sprint Nextel's network broken down by local exchange carrier and year. This information constitutes a trade secret because it is commercial information that, if disclosed, could cause substantial competitive harm to Sprint Nextel. This information is not publicly available. The Response provides highly proprietary Sprint Nextel network and traffic information. It would be difficult or impossible for someone to discover this information from other sources. If this information were available to competitors in this form, they could use it to the competitive detriment of Sprint Nextel.

4. Providers of the services offered by Sprint Nextel, including wireless, retail and wholesale wireline long distance, and wholesale telephony-related services operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

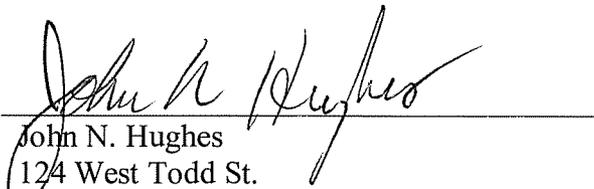
5. This information is not generally disclosed to non-management employees of Sprint Nextel and is protected internally by the Company as proprietary information.

6. The disclosure of this proprietary information would result in significant or irreparable competitive harm to Sprint Nextel by providing its competitors with non-reciprocal

competitive advantage. No public purpose is served by the disclosure of such information, and the Regulations of the PSC contemplate the filing of such information under Confidentiality Order.

7. The portions of the Response for which confidential treatment is sought are highlighted in the sealed copy of the Response that is provided with this Petition. Pursuant to the preceding discussion, Sprint Nextel requests that this information be deemed confidential by the PSC.

WHEREFORE, Sprint Nextel requests that the PSC enter all necessary Orders granting confidential treatment as requested.



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Attorney for Sprint Nextel

CERTIFICATE OF SERVICE

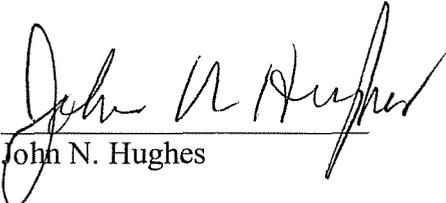
I certify that a copy of this Motion has been served by first class mail on the individuals listed below this 5th day of March, 2010.

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HIGHLY CONFIDENTIAL
ATTACHMENT B

Response to Windstream- Sprint 1-10 and 1-11
Originating and Terminating Access Minutes by Vendor 2006 to Present
Submitted: March 5, 2010

<u>Access Vendor</u>	<u>2006</u>	<u>2007</u>	<u>Originating</u>		<u>2010</u>	<u>Total</u>
			<u>2008</u>	<u>2009</u>		